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U.S. DISTRICT COURT
SALT LAKE CITY, UTAH

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

World Wide Association of Specialty
Programs, a Utah Corporation,

Plaintiff,

v.

PURE, Inc., PURE Foundation, Inc.
Sue Scheff, and Does I through 10,

Defendants.

) **MOTION FOR PROTECTIVE ORDER**

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Case Number: 2:02-cv-00010PGC

Judge Paul G. Cassell

Pursuant to Federal Rules of Civil Procedure 30(d)(3) and 26(c), Defendants PURE, Inc., PURE Foundation, Inc., and Sue Scheff (collectively "Defendants") by and through counsel respectfully move this Court for a protective order providing that the following discovery not be had:

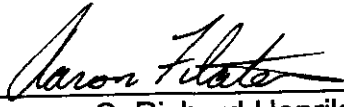
- That the portions of Sue Scheff's deposition discussing the programs to which Defendants refer be sealed.

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- That Plaintiff not be allowed to make contact in any way related to or in reference to this lawsuit or any of the people involved, with the programs to which Defendants refer clients in the course of their referral business.
- That Plaintiff's attorneys not be allowed to divulge to anyone the names or other identifying information about the programs to which the Defendants refer.

Good cause for this protective order exists because: (1) the programs to which the Defendants refer are irrelevant to the present litigation; (2) the programs are a trade secret and confidential information; and (3) contact or other access to the programs by Plaintiff would result in annoyance, embarrassment, oppression, and undue burden to Defendants. This Motion is supported by the Memorandum in Support of Defendants' Motion for Protective Order filed herewith.

DATED this 16th day of April, 2003.


C. Richard Henriksen, Jr.
James E. Seaman
Aaron W. Flater
Attorneys for Defendants PURE & Sue Scheff

CERTIFICATE OF MAILING

I hereby certify that on this 16th day of April, 2003, a true and correct copy of the foregoing **MOTION FOR PROTECTIVE ORDER**, was mailed postage prepaid, to the following:

Fred R. Silvester
Dennis J. Conroy
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